

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**Anthony M. Daniele and
Lisa L Daniele**

:Bankruptcy No. 20-14200

Debtors

Freedom Mortgage Corporation

: Chapter 13

Movant

v.

**Anthony M. Daniele and
Lisa L Daniele**

Respondents

DEBTORS' ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, come the Debtors, Anthony M. Daniele and Lisa L. Daniele, by and through their Attorney, Diana M. Dixon, and respectfully answer as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Strict proof is demanded at trial.
5. Admitted.
6. Admitted.
7. Admitted. However, Debtors deny that Movant lacks adequate protection and strict proof is demanded at trial.
8. Denied. Strict proof is demanded at trial.
9. Denied. Strict proof is demanded at trial.
10. Denied. Strict proof is demanded at trial.
11. No answer is necessary.
12. Denied. Strict proof is demanded at trial.
13. Denied. Strict proof is demanded at trial.

WHEREFORE, Debtors pray that this Honorable Court deny the Movant's Motion for Relief from the Automatic Stay.

Respectfully submitted,

By S/Diana M. Dixon, Esquire

DIANA M. DIXON, ESQUIRE

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